



21st Floor
1251 Avenue of the Americas
New York, NY 10020-1104

Robert Balin
212.489.8230 tel
212.489.8340 fax
RobBalin@dwt.com

October 1, 2024

VIA ECF

Hon. Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
Courtroom 21A
500 Pearl Street
New York, NY 10007-1312

**Re: *Savage v. Assoc. Newspapers Ltd., et al.*, No. 1:24-cv-03280-NRB
Savage v. NYP Holdings, Inc., et al., No. 1:24-cv-03278-NRB**

Dear Judge Buchwald:

This firm represents all defendants (“Defendants”) in the above-referenced related cases. We are advised by Plaintiff’s counsel that Plaintiff has decided not to file an amended complaint in either of these cases. Accordingly, pursuant to the Court’s Orders in both cases dispensing with a premotion conference, all parties have agreed to the following briefing schedule for Defendants’ motions to dismiss the complaints in both cases:

- Defendants will file their opening briefs by November 11, 2024
- Plaintiff will file his opposition to both motions by December 16, 2024
- Defendants will file their reply briefs by January 10, 2024

Respectfully submitted,

/s/ Robert D. Balin
Robert D. Balin